

Exhibit C

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1 BORDOVSKY - 12/1/21

2 IN THE UNITED STATES BANKRUPTCY COURT
3 FOR THE SOUTHERN DISTRICT OF TEXAS
4 HOUSTON DIVISION

5 In re: Chapter 11

6 BRAZOS ELECTRIC POWER Case No.
7 COOPERATIVE, INC. 21-30725 (DRJ)

8 Debtor.

9 BRAZOS ELECTRIC POWER
10 COOPERATIVE, INC.

11 Plaintiff

12 v. Adv. Proc. No.
13 ELECTRIC RELIABILITY 21-03863 (DRJ)

14 COUNCIL OF TEXAS, INC.

15 Defendant.

16 ***CONTAINS HIGHLY CONFIDENTIAL PORTIONS***

17 ***BOUND SEPARATELY***

18 PAGES 46-56, 71-72, 86-111

19 VIDEOTAPED ORAL DEPOSITION OF

20 KHAKI BORDOVSKY

21 Waco, Texas

22 December 1, 2021

23

24 Reported by: Susan S. Klinger, RMR-CRR, CSR

25 Job No. 202444

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2 is either an outside attorney or an expert,
3 so we won't need to excuse anyone who is
4 currently on from when we discuss highly
5 confidential information, Mark; is that
6 correct?

7 All right.

8 KHAKI BORDOVSKY,

9 having been first duly sworn, testified as
10 follows:

11 EXAMINATION

12 BY MR. ALIBHAI:

13 Q. Good morning. Could you please
14 state your full name.

15 A. My name is Khaki Jane Bordovsky.

16 Q. Ms. Bordovsky -- am I saying that
17 correct?

18 A. Yes.

19 Q. Ms. Bordovsky, how are you employed?

20 A. I'm employed by Brazos Electric.

21 Q. What is your current position?

22 A. My current position is vice
23 president of services.

24 Q. How long have you been the vice
25 president of services?

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2 * * *

3 Q. Let me hand you what has been marked
4 as Exhibit 30.

5 (Exhibit 30 marked.)

6 Q. This is an email from Mr. Evans to
7 you and Mr. Karnei and others dated
8 February 19th; correct?

9 A. That's correct.

10 Q. And it is a summary of collateral
11 calls from ERCOT; correct?

12 A. It appears to be a summary of
13 collateral calls from February 16th through
14 19th.

15 Q. And was the collateral call for
16 February 18th paid -- sorry -- the collateral
17 call for February 16th that was due
18 February 18th paid?

19 A. No, it was not.

20 Q. Was the collateral call for
21 February 17th that was due February 19th paid?

22 A. No, it was not.

23 Q. Was the collateral call for
24 February 18th that was due February 22nd paid?

25 A. No, it was not.

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2 C E R T I F I C A T E

3

4 I, SUSAN S. KLINGER, a certified shorthand
5 reporter within and for the State of Texas, do
6 hereby certify:

7 That KHAKI BORDOVSKY, the witness whose
8 deposition is hereinbefore set forth, was duly
9 sworn by me and that such deposition is a true
10 record of the testimony given by such witness.

11 I further certify that I am not related to
12 any of the parties to this action by blood or
13 marriage; and that I am in no way interested in
14 the outcome of this matter.

15 IN WITNESS WHEREOF, I have hereunto set my
16 hand this 2nd of December, 2021.

17 
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19 Susan S. Klinger, RMR-CRR, CSR

20 Texas CSR# 6531

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